

STEVEN T. GUBNER – NV Bar No. 4624
BG LAW LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101
Telephone: (702) 835-0800
Facsimile: (866) 995-0215
Email: sgubner@bg.law

Attorneys for Creditor Ryan Drexler

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

MP Reorganization,

Debtor.

Case No. 22-14422-nmc

Chapter 11

Hearing Date: March 19, 2024

Hearing Time: 9:30 a.m.

**NOTICE OF HEARING ON BG LAW LLP'S MOTION TO WITHDRAW AS COUNSEL
FOR RYAN DREXLER**

PLEASE TAKE NOTICE that *BG Law LLP's Motion to Withdraw as Counsel for Ryan Drexler* (the "Motion") was filed by BG Law LLP ("BG") in the above-captioned bankruptcy case. Through the Motion, BG seeks entry of an order authorizing BG to withdraw as counsel of record for Ryan Drexler in this bankruptcy case and the related adversary proceeding, Adv. No. 23-01093-nmc.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then you must file an opposition with the court, and serve a copy on the person making the Motion no later than 14 days preceding the hearing date for the Motion, unless an exception applies (see Local Rule

9014(d)(3)). The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local Rule 9014(c).

If you object to the relief requested, you *must* file a **WRITTEN** response to the Motion with the Court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the Court, or if you do not serve your written response on the person who sent you this notice, then:

- The Court may *refuse to allow you to speak* at the scheduled hearing; and
- The Court may *rule against you* without formally calling the matter at the hearing.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and any supporting declarations are available by contacting BG at the email address set forth above, through the Bankruptcy Court's electronic docketing system (PACER) at www.ect.nvb.uscourts.gov, or at the Bankruptcy Court's Clerk's Office, located at the Foley Federal Building, 300 Las Vegas Blvd., South, Las Vegas, Nevada, 89101.

PLEASE TAKE FURTHER NOTICE that pursuant to Administrative Order 2020-14, hearings are being held telephonically, absent further order of the Court. The hearing on the Motion will be held on **March 19, 2024, at 9:30 a.m.** before a United States Bankruptcy Judge, **telephonically** at the toll-free conference line: **(669) 254-5252, Meeting ID 161 166 2815, Passcode 115788#**.

If you intend to participate in the hearing on the Motion, you are encouraged to check the Court's website at <http://www.nvb.uscourts.gov/calendars/court-calendars/> in advance of the hearing for any updated telephonic instructions.

DATED: February 16, 2024

BG LAW LLP

By: /s/ Steven T. Gubner

Steven T. Gubner

Attorneys for Creditor Ryan Drexler

CERTIFICATE OF SERVICE

On February 16, 2024, I served the following document(s) (specify):

NOTICE OF HEARING ON BG LAW LLP'S MOTION TO WITHDRAW AS COUNSEL FOR RYAN DREXLER

I served the above-named document(s) by the following means to the persons as listed below:

☒ ECF System (You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)

SEE ATTACHED

☒ United States mail, postage fully prepaid (List persons and addresses.)

Ryan Drexler
24604 Malibu Road
Malibu, CA 90265

☐ Personal Service (List persons and addresses.)
I personally delivered the document(s) to the persons at these addresses:

☐ By direct email (as opposed to through the ECF System)
(List persons and email addresses.)
I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ By fax transmission (List persons and fax numbers.)
I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ By messenger (List persons and addresses.)
I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. (A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

Signed on: February 16, 2024

/s/ Abbie Au
Abbie Au

I served the above-named document(s) by the following means to the persons as listed below:

☒ ECF System (You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)

- **RYAN A. ANDERSEN** ryan@aandblaw.com, tatiana@aandblaw.com; melissa@aandblaw.com; ecf-df8b00a4597e@ecf.pacerpro.com; valerie@aandblaw.com; andersen.ryana.b117998@notify.bestcase.com
- **JERROLD L. BREGMAN** jbregman@bg.law, ecf@bg.law
- **OGONNA M. BROWN** obrown@lewisroca.com, ogonna-brown-4984@ecf.pacerpro.com, dberhanu@lewisroca.com, ombcalendar@lewisroca.com; jhess@lewisroca.com, klopez@lewisroca.com, rcreswell@lewisroca.com
- **CANDACE C CARLYON** ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com; nrodriguez@carlyoncica.com; 9232006420@filings.docketbird.com; Dcica@carlyoncica.com; tfrey@carlyoncica.com; nsharma@carlyoncica.com
- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAVID ERNESTO CHAVEZ** chavezd@ballardspahr.com, LitDocket_West@ballardspahr.com
- **SHAWN CHRISTIANSON** schristianson@buchalter.com, cmcintire@buchalter.com
- **DYLAN T CICILIANO** dciciliano@gtg.legal, bknotices@gtg.legal
- **JOHN D. FIERO** jfiero@pszjlaw.com
- **NEDDA GHANDI** nedda@ghandilaw.com, lks@ghandilaw.com, nedda@ecf.inforuptcy.com; r41525@notify.bestcase.com, shara@ghandilaw.com
- **STEVEN T GUBNER** sgubner@bg.law, ecf@bg.law
- **GABRIELLE A. HAMM** ghamm@nvfirm.com, ecf@nvfirm.com
- **ALLYSON JOHNSON** allyson@sylvesterpolednak.com, kellye@sylvesterpolednak.com
- **ROBERT R. KINAS** rkinas@swlaw.com, jmath@swlaw.com; mfull@swlaw.com; docket_las@swlaw.com; sdugan@swlaw.com; jfung@swlaw.com
- **BART K. LARSEN** BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- **BRYAN A. LINDSEY** blindsey@nvfirm.com
- **WILLIAM M. NOALL** wnoall@gtg.legal, bknotices@gtg.legal
- **TRACY M. O'STEEN** tosteen@joneslovelock.com, jlinton@joneslovelock.com; lrillera@joneslovelock.com; ljanuskevicius@joneslovelock.com
- **TERESA M. PILATOWICZ** tpilatowicz@gtg.legal, bknotices@gtg.legal
- **JASON H. ROSELL** jrosell@pszjlaw.com
- **SAMUEL A. SCHWARTZ** saschwartz@nvfirm.com, ecf@nvfirm.com; schwartzsr45599@notify.bestcase.com; eanderson@nvfirm.com; samid@nvfirm.com
- **BRIAN D. SHAPIRO** brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com; bryce@brianshapirolaw.com; 6855036420@filings.docketbird.com
- **JAMES PATRICK SHEA** jshea@shea.law, blarsen@shea.law; support@shea.law
- **ROBERT T. STEWART** rtstewart@foley.com, rgledhill@foley.com; robert-stewart-3880@ecf.pacerpro.com; docketflow@foley.com
- **STRETTO** ecf@cases-cr.stretto-services.com; aw01@ecfcbis.com, pacerpleadings@stretto.com
- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **MARK M. WEISENMILLER** mark@aandblaw.com, ecf-df8b00a4597e@ecf.pacerpro.com; weisenmiller.markm.b117998@notify.bestcase.com
- **JOSEPH G. WENT** jgwent@hollandhart.com, vlarsen@hollandhart.com; IntakeTeam@hollandhart.com
- **MATTHEW C. ZIRZOW** mzirzow@lzlawnv.com, carey@lzlawnv.com; trish@lzlawnv.com; jennifer@lzlawnv.com; valentina@lzlawnv.com; bchambliss@lzlawnv.com

ATTACHMENT TO CERTIFICATE OF SERVICE

☒ ECF System (You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)

- **RYAN A. ANDERSEN** ryan@aandblaw.com, tatiana@aandblaw.com; melissa@aandblaw.com; ecf-df8b00a4597e@ecf.pacerpro.com; valerie@aandblaw.com; andersen.ryana.b117998@notify.bestcase.com
- **JERROLD L. BREGMAN** jbregman@bg.law, ecf@bg.law
- **OGONNA M. BROWN** obrown@lewisroca.com, ogonna-brown-4984@ecf.pacerpro.com, dberhanu@lewisroca.com, ombcalendar@lewisroca.com; jhess@lewisroca.com, klopez@lewisroca.com, rcreswell@lewisroca.com
- **CANDACE C CARLYON** ccarlyon@carlyoncica.com, CRobertson@carlyoncica.com; nrodriguez@carlyoncica.com; 9232006420@filings.docketbird.com; Dcica@carlyoncica.com; tfrey@carlyoncica.com; nsharma@carlyoncica.com
- **CHAPTER 11 - LV** USTPRegion17.lv.ecf@usdoj.gov
- **DAVID ERNESTO CHAVEZ** chavezd@ballardspahr.com, LitDocket_West@ballardspahr.com
- **SHAWN CHRISTIANSON** schristianson@buchalter.com, cmcintire@buchalter.com
- **DYLAN T CICILIANO** dciciliano@gtg.legal, bknotices@gtg.legal
- **JOHN D. FIERO** jfiero@pszjlaw.com
- **NEDDA GHANDI** nedda@ghandilaw.com, lks@ghandilaw.com, nedda@ecf.inforuptcy.com; r41525@notify.bestcase.com, shara@ghandilaw.com
- **STEVEN T GUBNER** sgubner@bg.law, ecf@bg.law
- **GABRIELLE A. HAMM** ghamm@nvfirm.com, ecf@nvfirm.com
- **ALLYSON JOHNSON** allyson@sylvesterpolednak.com, kellye@sylvesterpolednak.com
- **ROBERT R. KINAS** rkinas@swlaw.com, jmath@swlaw.com; mfull@swlaw.com; docket_las@swlaw.com; sdugan@swlaw.com; jfung@swlaw.com
- **BART K. LARSEN** BLARSEN@SHEA.LAW, 3542839420@filings.docketbird.com
- **BRYAN A. LINDSEY** blindsey@nvfirm.com
- **WILLIAM M. NOALL** wnoall@gtg.legal, bknotices@gtg.legal
- **TRACY M. O'STEEN** tosteen@joneslovelock.com, jlinton@joneslovelock.com; lrillera@joneslovelock.com; ljanuskevicius@joneslovelock.com
- **TERESA M. PILATOWICZ** tpilatowicz@gtg.legal, bknotices@gtg.legal
- **JASON H. ROSELL** jrosell@pszjlaw.com
- **SAMUEL A. SCHWARTZ** saschwartz@nvfirm.com, ecf@nvfirm.com; schwartzsr45599@notify.bestcase.com; eanderson@nvfirm.com; samid@nvfirm.com
- **BRIAN D. SHAPIRO** brian@brianshapirolaw.com, kshapiro@brianshapirolaw.com; bryce@brianshapirolaw.com; 6855036420@filings.docketbird.com
- **JAMES PATRICK SHEA** jshea@shea.law, blarsen@shea.law; support@shea.law
- **ROBERT T. STEWART** rtstewart@foley.com, rgledhill@foley.com; robert-stewart-3880@ecf.pacerpro.com; docketflow@foley.com
- **STRETTO** ecf@cases-cr.stretto-services.com; aw01@ecfcbis.com, pacerpleadings@stretto.com
- **U.S. TRUSTEE - LV - 11** USTPRegion17.lv.ecf@usdoj.gov
- **MARK M. WEISENMILLER** mark@aandblaw.com, ecf-df8b00a4597e@ecf.pacerpro.com; weisenmiller.markm.b117998@notify.bestcase.com
- **JOSEPH G. WENT** jgwent@hollandhart.com, vlarsen@hollandhart.com; IntakeTeam@hollandhart.com
- **MATTHEW C. ZIRZOW** mzirzow@lzlawnv.com, carey@lzlawnv.com; trish@lzlawnv.com; jennifer@lzlawnv.com; valentina@lzlawnv.com; bchambliss@lzlawnv.com